



John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Craig W. Butler, Director

June 3, 2016

**Re: Arco Recycling, Inc.  
General Correspondence  
Construction Demolition Debris  
Cuyahoga County  
CDDL021638**

Michael Riley  
Arco Recycling, Inc.  
1705 Noble Road  
East Cleveland, Ohio 44112

**Subject: Facility Operational Review – April 2016**

Dear Mr. Riley:

On April 6, 2016, Ohio EPA's Division of Materials and Waste Management, Northeast District Office, conducted an unannounced, onsite inspection of the Arco Recycling construction and demolition debris (C&DD) recycling facility located at 1705 Noble Road, East Cleveland. The purpose of the site inspection was to verify that your C&DD recycling operation complies with applicable rules found in the Ohio Administrative Code (OAC), including:

1. meets the definition of recycling (OAC Rule 3745-400-01(II));
2. meets facility exclusion requirements (OAC Rule 3745-400-03(C));
3. meets the provisions of OAC Rule 3745-400-04; and
4. clean hard fill is stored in an appropriate manner (OAC Rule 3745-400-05).

Ohio EPA's review of Arco's operating data from June 2015 to April 2016 indicates the facility accepted a total of 220,466 cubic yards of C&DD. During the same period, 24,551 cubic yards of material was shipped off site. That resulted in an average turnover rate of only 11 percent.

We understand that Arco initially stockpiled a large amount of C&DD prior to beginning actual recycling operations and has made some strides in obtaining the equipment and personnel needed to recycle legitimate material; however, we are concerned the facility is accepting and storing more C&DD than it is processing and sending off site. Continuing this practice could result in C&DD residing at the facility for excessive periods of time and potentially be considered illegal disposal, a violation of the OAC.

Observations Noted During the Inspection

1. On the sorting line, C&DD with a beneficial reuse value (e.g. metal, clean hard fill, wood) was being separated into containers for shipment off site or for future onsite processing. C&DD without a beneficial reuse value was being removed for future disposal.
2. The manner in which C&DD was stockpiled prevented the oldest C&DD from being processed first.

Recommendations

1. Make substantial progress towards completing the Recycling Certification Institute (RCI) certification process, in order to remain a listed registrant with RCI.
2. Install weight scales at the facility to accurately verify recycling rates and comply with RCI requirements.
3. Achieve and maintain a recycling rate averaging at least 40 percent, so the facility is eligible to dispose of recovered screened material (RSM) at Ohio's licensed C&DD landfills (as outlined in the Ohio Addendum to the RCI certification program).
4. Keep accurate records of the weight/volume of material arriving onsite, being recycled and leaving the site, along with receipts from the destination facility. Also keep records of the weight/volume of non-recyclable material leaving site for disposal, including receipts from legitimate disposal facilities.

Nothing in this letter shall be construed as waiving or compromising in any way the applicability and enforcement of any federal, state and local statutes or regulations applicable to Arco Recycling, Inc.'s activities.

If you have any questions concerning this letter, don't hesitate to contact me at (330) 963-1245 or [bill.lutz@epa.ohio.gov](mailto:bill.lutz@epa.ohio.gov). Please reference the subject line of this letter in all correspondence.

Sincerely,



Bill Lutz  
Environmental Specialist  
Division of Materials and Waste Management

BL:cla

ec: Dane Tussel, Cuyahoga County Health Department  
Jennifer Kurko, Assistant Chief, Ohio EPA, NEDO  
cc: Christina Beynon, Arco Recycling